

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

PETER M. GALLIGAN,

PLAINTIFF

V.

**ADTALEM GLOBAL EDUCATION INC. F/K/A
DEVRY EDUCATION GROUP; ADTALEM
GLOBAL HEALTH, INC. F/K/A DEVRY
MEDICAL INTERNATIONAL, INC.; ROSS
UNIVERSITY SCHOOL OF MEDICINE
SCHOOL OF VETERINARY MEDICINE (ST.
KITTS) LIMITED; AND DOES 1 THROUGH
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DEFENDANTS

[illegible]

CIVIL CASE No. 1:17-cv-06310

JURY TRIAL DEMANDED

**AGREED MOTION CONCERNING BRIEFING DEADLINES
FOR DEFENDANTS' MOTION TO DISMISS
PLAINTIFF'S SECOND AMENDED COMPLAINT**

Plaintiff Peter M. Galligan (“Galligan”) and Defendants Adtalem Global Education Inc. f/k/a DeVry Education Group, Adtalem Global Health, Inc. f/k/a DeVry Medical International, Inc., and Ross University School of Medicine School of Veterinary Medicine (St. Kitts) Limited (collectively, “Defendants”) file this Agreed Motion Concerning Briefing Deadlines for Defendants’ Motion to Dismiss Plaintiff’s Second Amended Complaint (the “Agreed Motion”) and respectfully request that the Court enter the briefing schedule agreed to by the parties concerning their respective briefs associated with Defendants’ Motion to Dismiss Plaintiff’s Second Amended Complaint [Dkts. 33-35].

On August 31, 2017, Plaintiff filed this action against Defendants [Dkt. 1], and on October 19, 2017, he amended his complaint to utilize the correct entity names for

Defendants. [Dkt. 16] Defendants filed a motion to dismiss in November 2017 [Dkts. 18-20]. After Plaintiff responded to that motion to dismiss [Dkt. 25], the parties filed a joint stipulation dismissing Plaintiff's claims 3 and 4 [Dkt. 26], and Plaintiff also obtained leave for and filed a Second Amended Complaint. [Dkts. 27-32] Because their original motion to dismiss was rendered moot by Plaintiff's filing of the Second Amended Complaint [*see* Dkt. 30], Defendants filed the present motion to dismiss on March 27, 2018. [Dkts. 33-35]

Given the number and complexity of the claims at issue as well as other upcoming deadlines faced by counsel for both parties, the parties have agreed that Plaintiff shall file his response to Defendants' motion to dismiss on or before May 4, 2018. The parties have further agreed that Defendants may file a reply brief on or before May 18, 2018.

Therefore, the parties respectfully request that the Court grant this Agreed Motion and approve the foregoing briefing schedule. The parties further request that the hearing on the motion to dismiss that is currently set for April 4, 2018 [*see* Dkt. 35] and the status hearing that is currently set for May 2, 2018 [*see* Dkt. 31] be postponed pending the submission of those briefs.

Dated this 29th day of March, 2018.

Respectfully submitted,

/s/ Michael W. Ford

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- and -

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CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2018, a true and correct copy of the foregoing pleading was electronically filed in accordance with the Federal Rules of Civil Procedure and was served via e-mail upon the following counsel of record:

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/s/ Emil T. Bayko

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